

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION (BOSTON)

Jeffrey Solomon, Plaintiff,	)	
	)	
	)	
	)	Complaint
vs.	)	Civil Action No.
	)	
Annie Dookhan, Donald F. Keenan, Kate Corbett, Julie Nassif, Linda Han, Defendants.	)	<b>C.A. No.: 1:13-cv-10208-GAO</b>
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**PLAINTIFF JEFFREY SOLOMON INITIAL DISCLOSURES TO THE PLAINTIFF**  
**PURSUANT TO LOCAL RULES 26.2(A) AND 26.1(B)**

Pursuant to Local Rules 26.2(A) and 26.1(B), the Parties' Joint Statement Pursuant to Local Rule 6.1, Plaintiff Jeffrey Solomon, makes the following disclosures:

**A. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION**

1. Jeffrey Solomon (aka Jeffrey Banks);
2. Annie Dookhan, Former Hinton Lab Chemist;
3. Tanya Platt, Assistant District Attorney, Suffolk County;
4. Ryan Mingo, Assistant District Attorney, Suffolk County;
5. Nicole Cordero, Assistant District Attorney, Suffolk County;
6. Jennifer Sanders, Staff Attorney, Committee for Public Counsel Services;
7. Shannon McAulife, former Staff Attorney Committee for Public Counsel Services;
8. Kate Corbett, Former Hinton Lab Chemist;
9. Charles Salemi, Former Hinton Lab Supervisor of Operations;
10. Elizabeth O'Brien, Hinton Lab Supervisor of Evidence;
11. Julie Nassif, Former Hinton Lab Analytical Division;
12. Linda Han, Former Hinton Lab Director;
13. Judy Ann Bigby, Former Secretary Executive Office of Health and Human Services;
14. Jon Auerbach, Former Commissioner Department of Public Health;
15. Frank Wong, Boston Police Department;
16. Gino Rodrigues, Boston Police Department;
17. Stephen Green, Boston Police Department;
18. Ethen Gray, Boston Police Department;
19. Stephen Green, Boston Police Department;
20. Mark Brooks, Boston Police Department;
21. James Stoddard, Boston Police Department;

22. Kevon McElmoyle, Boston Police Department;
23. Richard Casallas, Boston Police Department;
24. Greg Walsh, Boston police Department;
25. Frank Nogueira, Boston Police Department;
26. Patrick McCarthy, Boston Police Department;
27. The Honorable, Governor Deval Patrick, Commonwealth of Massachusetts;
28. Dan Conley, Suffolk County District Attorney;
29. Donald Keenan, Boston Police Department;
30. Linda Poulis, Suffolk County District Attorney's Office;
31. Keeper of the Records, Suffolk County Sheriff's Office;
32. Keeper of the Records, Department of Correction, Commonwealth of Massachusetts;
33. Superintendent Bernard O'Rourke, Boston Police Department;
34. Superintendent Robert Merner, Bureau of Investigative Services;
35. Deputy Superintendent Norma Ayala Leong, Bureau of Investigative Services, Drug Control Unit.

Plaintiff reserves the right to supplement this list should be more information becomes available.

**B. DESCRIPTION OF RELEVANT DOCUMENTS/TRANSCRIPTIONS**

1. Boston Police Incident Reports;
2. BPD Arrest booking Form;
3. Prisoner Booking Form;
4. Drug Control Log;
5. Copy of Buy Money;
6. CAD sheet;
7. Boston Municipal Court File, No. 1001CR9024;
8. Grand Jury Minutes, Commonwealth v. Jeffrey Banks, SUCR 2011-10667;
9. Motion to Dismiss Hearing;
10. Drug Certificates, Hinton Lab, Admitted to Grand Jury Proceedings;
11. Control Card and other documentation from Hinton Lab;
12. Statement of Probable Cause, State Police, Criminal Complaint of Annie Dookhan.

**C. INSURANCE AGREEMENTS**

Not Applicable to the Plaintiff; the Plaintiff will inquire as to insurance/indemnity agreements that are by and between the defendants and the Commonwealth;

**D. EXPERT WITNESSES**

The plaintiff is actively seeking experts and will be supplementing this response as required by the Rules.

**E. ITEMIZED ECONOMIC LOSS**

1. Time spent detained during wrongful incarceration and malicious prosecution;

2. Loss of wages and loss of opportunity from March 2011 until September 2012; \$15.00-\$20.00 dollars per hour at 30-40 hours per week.

**F. SWORN STATEMENT IN ACCORDANCE WITH LOCAL RULE 26.1(B)**

Pursuant to Local Rule 26.1(B)(2), the following statement is sworn to by all counsel on behalf of the Plaintiff.

1. The names contained in Section A, *supra*, constitutes all persons presently known to the Plaintiff, who were percipient witnesses to the incidents or have discoverable information about the facts of the various circumstances that gave rise to the Plaintiff's claims against the defendants.

**G. DEPOSITIONS**

Plaintiff Jeffrey Solomon is likely going to depose:

1. Annie Dookhan;
2. Donald Keenan;
3. Kate Corbett;
4. Linda Han;
5. Jon Auerbach;
6. Julie Nassif;
7. Elizabeth O'Brien;
8. Charles Salemi;
9. Tanya Platt;
10. Any other person with discoverable information.

The Plaintiff,  
Jeffrey Solomon,  
By his Attorneys,

/s/ Victoria Kelleher

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/s/ Joseph M. Perullo

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Dated: May 7, 2014

**CERTIFICATION OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).